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UNITED ES ENVIRONMENTAL PROTECT ENCY

DATE: September 1, 1981

SUBJECT: Transmittal of Inspection Reports

FROM: Billy J. Fairless, Ph.D. Billy Fairless
Chief, Technical Services Branch

TO: Michael J. Sanderson
Chief, Compliance Branch, ENFC

This memorandum transmits the following reports of insepction performed by the Air Section, Technical Services Branch, Surveillance and Analysis Division.

Facility	RCRA Number	Inspector
Perfection Mfg. Company St. Louis, Missouri	EPA ID NO. MOD041885856	Nancy Thrutchley
Brown Shoe Company St. Louis, Missouri	EPA ID NO. MOT300010956	Nancy Thrutchley

Attachments

EPA Form 1320-6 (Rev. 3-76)

REPORT OF RCRA COMPLIANCE INSPECTION

PERFECTION MANUFACTURING COMPANY

ST. LOUIS, MISSOURI

EPA ID NUMBER: MOD041885856

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Surveillance and Analysis Division

INTRODUCTION

This inspection was conducted under authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, to evaluate the facility's compliance with the hazardous waste management regulations established pursuant to RCRA. This inspection was conducted, on August 13, 1981, at the request of the Enforcement Division.

Mr. Jerry Talbot, Plant Manager, was requested to inform Ms. Thrutchley of any business information which should be handled as confidential. None was indicated.

PARTICIPANTS

U.S. EPA: Nancy E. Thrutchley, Environmental Scientist

Perfection Mfg.: Jerry Talbot, Plant Manager
Jerry Porter, Paint Foreman

PROCESS INFORMATION

This facility is engaged in the manufacture of exercise bicycles to be sold at Sears. Processes include some parts fabrication, assembly, welding and painting.

Two hazardous wastes are generated at this facility. The first is paint sludge accumulated from cleaning out the water wall paint booth. This sludge has been tested by the Laboratory Division of the Laclede Gas Company and failed EP Toxicity tests for lead.

The second hazardous waste generated regularly is spent xylene. This waste was also tested by the same laboratory and because it has a flash point of less than 70°F it is considered ignitable. Waste xylene is also a listed hazardous waste, F003.

At the time of this inspection, there were four barrels of waste which had been left by the previous owner of the facility. This waste had also been tested by the Laclede Gas Laboratory and failed EP Toxicity tests for cadmium, lead, and chromium.

OBSERVATIONS AND CONCLUSIONS

At the time of this inspection, the barrel storage area was to the west of the main building. There were nine 55-gallon barrels of waste paint sludge lined up in two rows. They were marked and labeled properly and all were dated either July 31, 1981 or August 3, 1981. There were also four barrels of waste xylene and the four barrels of waste from the provious owners which were being stored in this area and which were not labeled, marked, or dated. These were all on pallets, and there was surface corrosion on many of the barrels. The waste xylene barrels were being stored next to the fence which Mr. Talbot reported to be the property line. Because this waste is ignitable, it is required by Part 265.176 that it be stored at least 15 meters from the property line. Mr. Talbot assured the inspector that the barrels of waste xylene would be moved to an appropriate location no later than the next morning.

The barrels of waste which were not dated had been stored since before April 23, 1981 which is when samples were taken of the wastes. Therefore, because these barrels had been accumulated on-site for more than 90 days, the requirements of Part 262.34, Accumulation Time, where not being met. Mr. Talbot reported that permit application had been made with Illinois EPA to incinerate the waste at Trade Waste Incineration, Inc., and when that permit was received, the wastes would be disposed of as soon as possible.

The paint sludge was being disposed of at Bob's Home Service, of Wright City, Missouri. The last shipment was made on June 17, 1981, and was manifested properly.

Mr. Talbot acknowledged that the Personnel Training Plan and the Contingency Plan had not been developed.

DISCUSSION

In a telephone conversation with Mr. Talbot on August 20, 1981, he reported that the xylene waste had been moved to a location at least 15 meters from their property line. Also, he reported that on August 19, 1981, he had received the permit from Illinois EPA to incinerate the waste xylene and the contents of the four barrels of waste left by the previous owners. He indicated that those wastes would be shipped off-site in a timely manner. The development of the required plans had been also been started.

Nancy Thrutchley
Environmental Scientist
Date: 8/25/81

John R. Helvig
Chief, Air Section
Date: 8-26-81

MO[illegible]04700503[illegible]

IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS

I. General Information:

(A) Facility Name: PERFECTION MANUFACTURING

(B) Street: 5441 BULWER AVE.

(C) City: ST. LOUIS (D) State: MO. (E) Zip Code: 63147

(F) Phone: 314-381-2200 (G) County: ______

(H) Operator: ______

(I) Street: ______

(J) City: ______ (K) State: ______ (L) Zip Code: ______

(M) Phone: ______ (N) County: ______

(O) Owner: TRUE TEMPER CORP.

(P) Street: ______

(Q) City: MEMPHIS (R) State: TENN. (S) Zip Code: ______

(T) Phone: ______ (U) County: ______

(V) Type of Ownership:

___ Federal	___ Municipal	X Private
___ State	___ County	

(W) Date of Inspection: 8/13/81 (Q) Time of Inspection (From) 11:15 (To) 2:00

(X) Weather Conditions: ______

NANCY HARUTC	U.S.E.P.	816-374-4461

(Z) Inspection Participants | Title | Telephone

Inspection Participants	Title	Telephone
JERRY TALBOT	PLANT MANAGER	314-381-2200
JERRY PORTER	PAINT FOREMAN	"

II. Description of Site Activity

(A) X Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) ____ Chemical, Physical and Biological Treatment (Form 4)

(D) ____ Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: ______________________________

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	____	X	____	____

COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Section A - EPA Identification No.

1. Does Generator have EPA I.D. No.? X Yes ___ No

   a. If yes, EPA I.D. No. MDD041885856

262.21 Section B - Manifest

1. Does generator ship waste off-site? X Yes ___ No

   a. If no, do not fill out Sections B and D.

   b. If yes, identify primary off-site facility(s) Use narrative explanations sheet.)

2. Does generator use Manifest? X Yes ___ No

   a. If no, is generator a small quantity generator? ___ Yes ___ No
   261.5 1. If yes, does generator indicate this when sending waste to a T/S/D facility ___ Yes ___ No

   b. If yes, does manifest include the following information?

   1. Manifest Document No. X Yes ___ No

   2. Generators Name, Mailing Address, Telephone No. X Yes ___ No

   3. Generator EPA I.D. No. X Yes ___ No

   4. Transporter(s) Name and EPA I.D. No. X Yes ___ No

   5. a. Facility Name, Address and & EPA I.D. No. X Yes ___ No
      b. Alternate Facility Name, Address and EPA ID NO. ___ Yes ___ No
      c. Instructions to return to generator if undeliverable? ___ Yes ___ No

   6. Waste information required by DOT - Shipping name, quantity, (weight, or vol.) containers (type and number.) Not exact DOT name "solid" * X Yes ___ No

   7. Emergency Information (optional) (special handling instructions, phone no.) X Yes ___ No

* DOT NAME LISTED AS HAZARDOUS WASTE, N.O.S. SHOULD BE "HAZARDOUS WASTE, SOLID, N.O.S."

(8) Is the following certification on each manifest form? X Yes ___ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

(9) Does Generator retain copies of Manifests? X Yes ___ No

If yes, complete a through e.

a. (1) Did generator sign and date all manifests? X Yes ___ No
(2) Who signed for generator? Name Ward Buck Title V.P.

b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? X Yes ___ No
(2) Who signed and dated for transporter? Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? X Yes ___ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? X Yes ___ No

e. Does generator retain copies for 3 years? X Yes ___ No

Section C - Hazardous Waste Determination

262.12 1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? X Yes ___ No

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) styrene

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosovity, ignitability, reactivity, EP toxicity) X Yes ___ No

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) paint sludge

b. Does generator determine characteristics by testing or by applying knowledge of processes? TESTING

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? X Yes ___ No

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by gene ators? X Yes ___ No

   a. If yes, did generator test all wastes to determine non-hazardous characteristics? ___ Yes X No

      1. If no, list wastes and quantities deemed non-hazardous or processes from which non-hazardous waste was produced? (Use additional sheet if necessary.)

WATER FROM PARTS WASHER GOES TO SEWER.

Section D - Pre-Transport Requirements

1. Does Generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) X Yes ___ No

265.174 2. a. Are containers to be shipped leaking or corroding? ___ Yes X No
   b. Use sheet to describe containers and condition.
   c. Is there evidence of heat generation from incompatible wastes in the containers? ___ Yes ___ No

262.32 3. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? X Yes ___ No

4. Does the generator mark each package in accordance with 49 CFR 172? X Yes ___ No

5. Is each container of 110 gallons or less marked with the following label? X Yes ___ No

   Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

   Generator's Name and Address yes

   Manifest Document Number yes

262.33 6. Does generator have placards to offer to transporters? X Yes ___ No

262.34 7. Accumulation Time

   a. Are containers used to temporarily store waste before transport? X Yes ___ No

1. If yes, is each container clearly dated? Also, fill out rest of No. 7 (Accum. Time) — X Yes [redacted] No

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - inspections) — ___ Yes X No
2. If yes, with what frequency? _____

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive wastes) — ___ Yes X No (but plan to move them in A.M.)

NOTE: If tanks used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D 3, 4, & 5 of this form? — ___ Yes X No

NOTE: If generator accumulates waste on-site, fill out checklist for General Facilities, Section B - Preparedness and Prevention, Section C - Contingency Plan and Emergency Procedures

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training) ___ Yes X No

8. Describe storage area. Use photos and narrative explanation sheet.

262.40 Section E - Recordkeeping and Records

1. Does gnerator keep the following reports for 3 years?

a. Manifests and signed copies from designated facilities? — X Yes ___ No
b. Annual reports — N/A Yes ___ No
c. Exception Reports — N/A Yes ___ No
d. Test results — X Yes ___ No

2. Where are records kept (at facility or elsewhere)? _____
3. Who is in charge of keeping the records? Name_____ Title_____

Section F - Special Conditions

262.50 1. Has generator received from or transported to a foreign source any hazardous waste? — ___ Yes X No
a. If yes, has he filed a notice with the Regional Administrator? — ___ Yes ___ No
b. Is this waste manifested and signed by Foreign consignee? — ___ Yes ___ No
c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? — ___ Yes ___ No

265.15 (d) 6. Does the owner/op or maintain an inspection log ___ Yes ___ No

A. If yes, does it include:

(1) Date and time of inspection? ___ Yes ___ No

(2) Name of inspector? ___ Yes ___ No

(3) Notation of observations? ___ Yes ___ No

(4) Date and nature of repairs or remedial action? ___ Yes ___ No

B. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet). ___ Yes ___ No

265.16 Personnel Training

7. Does the owner/operator maintain Personnel Training Records at the facility? ___ Yes X No
How long are they kept? _____

A. If yes, do they include:

(1) Job title and written job description of each position? ___ Yes ___ No

(2) Description of type and amount of training? ___ Yes ___ No

(3) Records of training given to facility personnel? ___ Yes ___ No

265.17 Requirements for Ignitable, Reactive or Incompatible Waste

(a) 8. Does facility handle ignitable or reactive wastes? X Yes ___ No

A. If yes, is waste separated and confined from sources of ignit on or reaction, (open flames, smoking, cutting and wel ng, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? X Yes ___ No

1. If yes, use narrative explanations sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

B. Are smoking and open flame confined to specifically designated locations? ___ Yes ___ No

C. Are "No Smoking" signs posted in hazardous areas? ___ Yes X No (NA)

(b) 9. Check containers

A. Are containers leaking or corroding? some surface corrosion ___ Yes ___ No

B. Is there evidence of heat generation from incompatible wastes? ___ Yes X No
(Use narrative explanations sheet to describe condition of containers.)

265.31 Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? ___ Yes X No

If yes, use narrative explanations sheet to explain.

265.32 2. Is the facility equipped with

A. Internal communication or alarm system? fire alarm X Yes ___ No

(1) Is it easily accessible in case of emergency? ___ Yes ___ No

B. Telephone or two-way radio to call emergency response personnel? X Yes ___ No

C. Portable fire extinguishers, fire control equipment (spill control equipment) and decontamination equipment? X Yes ___ No

265.33 (1) Is this equipment tested to assure its proper operation? X Yes ___ No

D. Water of adequate volume for hoses, sprinklers or water spray system? X Yes ___ No

(1) Describe source of water _____

265.35 3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? X Yes ___ No

265.37 4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) ___ Yes X No

265.50 5. In the case that more than one police and fire department might respond, is there a designated primary authority? NA ___ Yes ___ No
a. If yes, list primary authority _____

265.52 (a) 6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? ___ Yes X No
Are they readily available to all personnel? ___ Yes ___ No

(c) 7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ___ Yes X No

8. If State or local authorities decline to enter, is this entered in the operating record? ___ Yes ___ No

265.52 Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ___ Yes X No

a. If yes, is it a revised SPCC Plan? ___ Yes ___ No

2. Is there an emergency coordinator on site at all times? ___ Yes ___ No

Section D - Manifest System, Recordkeeping and Reporting

265.71 1. Does facility receive waste from off-site? ___ Yes ___ No

a. If yes, does the owner/operator retain copies of all manifests? ___ Yes ___ No

LACLEDE GAS COMPANY
Laboratory Division
4118 SHREWSBURY
ST. LOUIS, MISSOURI 63119
(314) 644-6577

June 8, 1981

Perfection Mfg.
Attn: Mr. J. Talbot
5411 Bulwer
St. Louis, MO. 63147

Dear Mr. Talbot:

On May 22, 1981, this laboratory performed sampling at your firm's facility. A composite sample of the solvent waste was analyzed according to the criterion in the May 1980, Federal Register (40CF,R261 - Methods for Identification of Hazardous Waste). The characteristics of reactivity, ignitability, corrositivity and toxcity were determined for this sample. Additional tests were performed to meet certain requirements of Trade Waste Incineration, Inc.

The results of our analysis is as follows:

TEST PARAMETERS	RESULTS (mg/1)
Arsenic	*0.0025
Barium	*0.4
Cadmium	*0.03
Chromium	*0.10
Copper	*0.10
Lead	*0.05
Mercury	*0.0025
Nickel	*0.15
Selenium	*0.003
Silver	*0.06
Zinc	2.0

WASTE XYLENE
(NT)

TEST PARAMETERS	RESULTS (mg/1)
Water %	0.0
Solids %	7.0
Ash % 650°C	0.6
Total cyanide (mg/1)	*0.1
Sulfur %	0.03
Chlorine %	0.14
BTU/lb	17,748
flash point (°F)	*70

*less than

Any further inquires regarding these samples are welcomed.

Thank you.

Sincerely,

William T. Fitzgerald

WTF:eb

cc: Mrs. V. Meister

LACLEDE GAS COMPANY
Laboratory Division
4118 SHREWSBURY
ST. LOUIS, MISSOURI 63119
(314) 644-6577

May 12, 1981

Perfection Mfg. Co.
Attn: Mr. J. Talbot
5411 Bulwer
St. Louis, MO. 63147

Dear Mr. Talbot:

On April 23, 1981, this laboratory performed sampling at your firm's facility. A sample was taken from Drum 1, 2 and 3 and the second sample was taken from drum #4. These samples were subjected to a variety of tests to meet the requirements of Trade Waste Incineration, Inc. These samples were analyzed according to the methods outlined in the Federal Register 40 CFR261- Methods for Identification of Hazardous Waste.

The results of our analysis is as follows:

Drum sample #4

Test Parameter	Results (mg/1)
Arsenic	0.12
Barium	*0.4
Cadmium	*0.03
Chromium	67.0
Copper	140.0
Lead	100.0
Mercury	0.097
Nickel	*0.15
Selenium	0.20
Silver	*0.06
Zinc	100.0
total Cyanide	*0.1
Solids 100°C	60.0%
Ash content 650°C	6.58%
Moisture	0.0%
Flash Point °F	Above 140°
BTU/lb	12,802
Chlorine	0.54%
Sulphur	*0.01%

*less than

BY: W. T. Fitzgerald
W. T. Fitzgerald

WTF:eb

4 BARRELS FROM PREVIOUS OWNERS. (MT)

LACLEDE GAS COMPANY
Laboratory Division
4118 SHREWSBURY
ST. LOUIS, MISSOURI 63119
(314) 644-6577

May 12, 1981

Perfection Mfg. Co.
Attn: Mr. J. Talbot
5411 Bulwer
St. Louis, MO. 63147

Dear Mr. Talbot:

On April 23, 1981 this laboratory performed sampling at your firm's facility. A sample was taken from Drum 1, 2 and 3 and the second sample was taken from drum #4. These samples were subjected to a variety of tests to meet the requirements of Trade Waste Incineration, Inc. These samples were analyzed according to the methods for the Federal Register 40 CFR261 - Methods for Identification of Hazardous Waste.

The results of our analysis is, as follows:

Sample from drums 1, 2 and 3

Test Parameter	Results (mg/l)
Arsenic	0.076
Barium	17.0
Cadmium	✓4.0
Chromium	✓54.7
Copper	34.0
Lead	✓285.0
Mercury	0.185
Nickel	12.0
Selenium	*0.003
Silver	*0.06
Zinc	250.0
total Cyanide	2.36
Solids 100°C	58.0%
Ash Content 650°C	41.2%
Moisture	0.0%
Flash point °F	Above 140
BTU/lb	1437
Chlorine	0.24%
Sulphur	0.03

*less than

BY: W. T. Fitzgerald
W. T. Fitzgerald

EB

MIKE

LACLEDE GAS COMPANY
Laboratory Division
4118 SHREWSBURY
ST. LOUIS, MISSOURI 63119
(314) 644–6577

March 17, 1981

Perfection Mfg., Inc.
Attn: Mr. Charles Weston
5411 Bulwer
St. Louis, MO. 63147

RE: Analysis of a waste sample received on: 3/4/81
paint sludge

Tests		TEP analysis	EPA Limits
Arsenic	PPM	0.0025	5.0
Barium	"	*0.4	100.0
Cadmium	"	1.0	1.0
Chromium (Total)	"	*0.10	5.0
Copper	"	6.2	
Lead	"	10.0	5.0
Mercury	"	0.0001	0.2
Nickel	"	*0.15	
Selenium	"	*0.03	1.0
Silver	"	*0.06	5.0
Zinc	"	15.0	
Cyanide	mg/l		
pH	unit	5.0	
Flash point (^{o}F)		Above 140	
Solids	%	70	
Volatiles (100^{o}C)	%	30	
Volatiles (600^{o}C)	%	66.7	
Organic liquid solvents	%	*0.5	

*less than
This waste is classified as:
Reactive
Ignitable
Corrosive
X- Toxic
Infectious

Respectfully submitted,

BY William T. Fitzgerald

William T. Fitzgerald

eb

PAINT SLUDGE (WT)